

Presented to the Court by the foreman of the
Grand Jury in open Court, in the presence of
the Grand Jury and FILED in the U.S.
DISTRICT COURT at Seattle, Washington.

September 20, 2023
By Ravi Subramanian, Clerk
[Signature] Deputy

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,
Plaintiff

v.

SAJED AL-MAAREJ,
Defendant.

NO. **CR 23 - 147 RSL**
INDICTMENT

The Grand Jury charges that:

COUNT 1

(Conspiracy to Commit Wire and Mail Fraud)

A. Overview

1. From about September 21, 2020 through at least about December 28, 2022, Defendant SAJED AL-MAAREJ, and others known and unknown to the Grand Jury, orchestrated a scheme to secure fraudulent refunds for himself and thousands of retail customers, while permitting the customers to keep the merchandise they ordered. This refunding fraud caused at least approximately \$3.9 million in losses for retailers around the country, including retailers located within the Western District of Washington.

1 2. The scheme followed the same basic pattern throughout the duration of the
2 fraud: AL-MAAREJ solicited purchasers to participate in his scheme through Telegram,
3 a messaging service that enables users to disseminate messages to a large audience
4 through public “channels.” AL-MAAREJ operated a refunding Telegram channel called
5 “Simple Refunds.”

6 3. AL-MAAREJ encouraged purchasers to buy items from online retailers
7 AL-MAAREJ claimed he could defraud (hereinafter “Victim Companies”). The
8 purchaser then contacted Simple Refunds request assistance in obtaining a refund, while
9 also permitting the purchaser to keep the products they ordered.

10 4. The purchaser provided AL-MAAREJ and his co-conspirators certain
11 information about their order, including purchaser name, order number, amount of the
12 order, and shipping address. AL-MAAREJ captured that information in an online
13 sharable spreadsheet, to which he and his co-conspirators members had access. AL-
14 MAAREJ and co-conspirators at AL-MAAREJ’s direction then used the information in
15 the spreadsheet to pose as the purchaser and seek a refund from the online retailer.

16 5. AL-MAAREJ used common misrepresentations to convince the retailer to
17 dispense the refund without requiring the purchaser to return the product. For example:

- 18 a. AL-MAAREJ, or a co-conspirator at AL-MAAREJ’s direction, would
19 falsely claim that the purchaser did not receive the ordered item. AL-
20 MAAREJ or the co-conspirator sometimes directed employees at United
21 Parcel Service (UPS) to input false scans into the order tracking history,
22 which assisted them in persuading the retailer to issue the refund.
- 23 b. AL-MAAREJ and his co-conspirators also used United States Postal
24 Service (USPS) insiders to input false “return to sender” scans into the
25 parcel tracking, even though the purchaser received the item as intended.

1 The victim retailer believed the product had been returned and issued a
2 refund.

3 c. AL-MAAREJ, or a co-conspirator at acting AL-MAAREJ's direction,
4 informed the victim company that the purchaser wanted to return the
5 product. The purchaser returned a package that contained nothing, garbage,
6 or junk. The retailer issued a refund before it uncovered the ruse.

7 6. The end goal of each of these misrepresentations was to deceive the retailer
8 into (a) believing the purchaser had returned (or intended to return) the product or there
9 was a problem with the product's delivery, and (b) issuing a refund to the purchaser for
10 that return. In fact—as AL-MAAREJ and his co-conspirators well knew—the purchaser
11 intended to keep the purchased product. The purchaser kept both the purchased item and
12 a fraudulently induced refund payment equivalent to the value of that item.

13 7. In exchange for facilitating the refund on behalf of the purchaser, AL-
14 MAAREJ charged the purchaser a percentage of the value of the refund payment. The
15 percentage depended on the retailer and typically ranged from 15% to 25% of the refund.

16 8. Simple Refunds was responsible for approximately \$2,900,000 worth of
17 fraudulently induced refunds under AL-MAAREJ's leadership. AL-MAAREJ and his co-
18 conspirators defrauded more than 50 Victim Companies on behalf of hundreds of
19 purchasers. The largest victim is Victim Company 1, which is located within the Western
20 District of Washington. VC1 lost at least approximately \$1,400,000 to the scheme.
21 Victim Company 2 and Victim Company 3, other western Washington-based retailers,
22 experienced at least approximately \$290,000 and \$80,000 in losses respectively. In total,
23 western Washington-based retailers lost at least approximately \$1.9 million to AL-
24 MAAREJ's scheme.

25 9. AL-MAAREJ personally engaged in fraudulent refunding while assisting
26 others to do the same. AL-MAAREJ personally obtained at least approximately
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1 \$1,000,000 in fraudulently induced refunds paid directly to his personal bank and credit
2 cards accounts or for items sent to his address.

3 **B. The Conspiracy**

4 10. Beginning on or about September 21, 2020, and continuing through at least
5 on or about December 28, 2022, in Snohomish County, within the Western District of
6 Washington, and elsewhere, SAJED AL-MAAREJ and others did conspire, confederate
7 and agree, together with each other and others known and unknown to the Grand Jury, to
8 commit the offenses of wire fraud and mail fraud in violation of Title 18 United States
9 Code, Sections 1343 and 1341.

10 11. That is, AL-MAAREJ, together with others known and unknown, with
11 intent to defraud, agreed to knowingly devise a scheme and artifice to defraud, and to
12 obtain money and property by means of materially false and fraudulent pretenses,
13 representations, and promises.

14 12. AL-MAAREJ agreed with others known and unknown to execute and
15 attempt to execute the scheme and artifice to defraud by knowingly transmitting, and
16 causing to be transmitted, by wire communication in interstate and foreign commerce,
17 writings, signs, signals, pictures, and sounds, and aided and abetted others to do the same.
18 Several of those wires originated in the Western District of Washington and traveled
19 interstate.

20 13. AL-MAAREJ agreed with others known and unknown to execute and
21 attempt to execute the scheme and artifice to defraud by knowingly causing to be
22 delivered, by FedEx, UPS, and the USPS, all private or public commercial interstate
23 carriers, according to the directions thereon, one or more packages to addresses within
24 the Western District of Washington, and aided and abetted others to do the same.

25 14. The object of the conspiracy was to purchase merchandise from the Victim
26 Companies and then fraudulently obtain refunds of the purchase price, while still
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1 retaining the merchandise, by falsely representing to the Victim Companies that, for
2 example, the purchaser had not received the ordered merchandise or the purchaser
3 already returned the item. AL-MAAREJ and his co-conspirators defrauded retailers by
4 causing them to pay at least \$3,900,000 to AL-MAAREJ or the retail customers (AL-
5 MAAREJ's co-conspirators) based on fraudulent refund claims. The co-conspirators then
6 paid AL-MAAREJ a percentage of these refunds.

7 **C. Manner and Means**

8 The following conduct was part of the conspiracy:

9 **a. Simple Refunds Telegram Channels**

10 15. AL-MAAREJ, together with others known and unknown to the Grand Jury,
11 operated a fraudulent refunding service on Telegram called "Simple Refunds"
12 (@Simplerefund). Simple Refunds operated on at least two Telegram channels. Telegram
13 is a cloud-based messaging service that users can access through an application on their
14 mobile device or computer, or through the web. Telegram enables users to disseminate
15 messages to large groups through "channels." Telegram channels can have an unlimited
16 number of members. Channels can be public or private. Public channels have a
17 permanent uniform resource locator (URL), which enables easy sharing, search, and
18 discovery. Only the channel's creator or someone the creator has designated as an
19 administrator may post content to a Telegram channel. Posts may be anonymous or
20 signed by the administrator who wrote the post.

21 16. AL-MAAREJ used the first Telegram channel—the Simple Refunds
22 "main" channel—to advertise his services and provide updates about the stores Simple
23 Refunds could defraud. The channel was public, which means it was accessible to anyone
24 with an Internet connection. It amassed a following of over 1,000 subscribers throughout
25 the course of the conspiracy. Under AL-MAAREJ's leadership, there were hundreds of
26 posts on the Simple Refunds main channel ranging in content from general updates (such
27

1 as AL-MAAREJ's planned vacation dates) to correspondence about a particular type of
2 refund.

3 17. AL-MAAREJ used the second channel—the “vouches” sub-channel—to
4 display screenshots, or “vouches,” of successful refunds. Customer vouches were a
5 primary tool AL-MAAREJ used to promote his illegal business. Like the main channel,
6 the Simple Refunds Vouches channel was public.

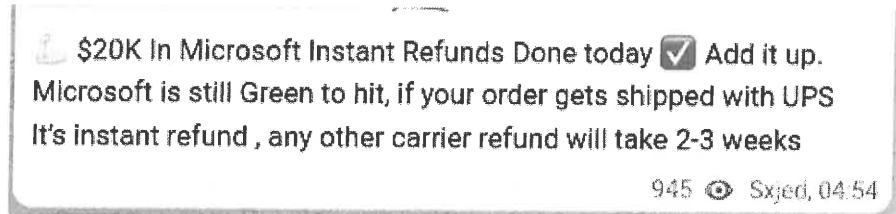
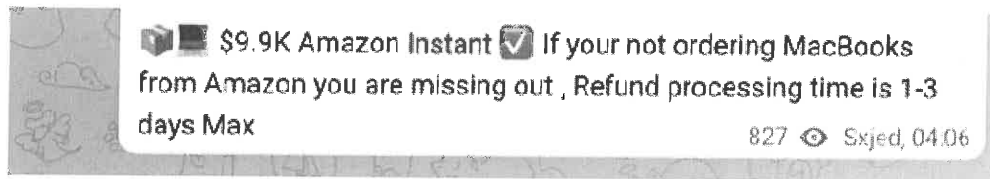
7 **b. The Agreements**

8 18. The Simple Refunds conspiracy involved participants at three levels: AL-
9 MAAREJ, his staff of refunders, and the purchasers.

10 19. AL-MAAREJ was at the top of the pyramid—he developed Simple
11 Refunds and the infrastructure on which it operated. AL-MAAREJ ran Simple Refunds
12 day-to-day. For example, AL-MAAREJ troubleshooted problems with refunds (“Submit
13 All [VC1] orders before they ship – fixing all failed [VC1] orders” April 2, 2022);
14 provided updates on his own scheduling and work-flow (“Gm, be online in 30, everyone
15 with an [VC9] order that was sent thru DMs please BUMP, I’m processing all of em
16 today, got busy last night” February 22, 2022); and advertised specific aspects of the
17 fraud (“[VC1] MacBook Instant Refunds Are 🔥 🔥 Right now make sure you take
18 advantage and order” March 4, 2022).

19 20. AL-MAAREJ sometimes relied on Simple Refunds staff—known as
20 “Professional Refunders”—to engage with the retailers on the purchasers’ behalf and
21 secure a fraudulent refund. These Professional Refunders worked on AL-MAAREJ’s
22 behalf and at his direction. They were the second level of the pyramid.

23 21. Purchasers—or Simple Refunds customers—were at the bottom of the
24 pyramid. AL-MAAREJ enticed them into the conspiracy by aggressively advertising his
25 refunding scheme on Telegram, as shown in the following posts on Simple Refunds:
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22. AL-MAAREJ and his co-conspirators worked with dozens of Purchasers throughout the course of the conspiracy. In each instance, AL-MAAREJ or a co-conspirator agreed with the Purchaser that AL-MAAREJ or a Simple Refunds Professional Refunder would seek a fraudulent refund on the Purchaser's behalf.

23. For example, Snohomish County, Washington resident Purchaser 1 (P1) learned about Simple Refunds while on social media. In March 2022, P1 ordered two items worth more than \$1,000 from Victim Company 4 (VC4). The items shipped to P1's home within the Western District of Washington. P1 requested AL-MAAREJ's help in obtaining a fraudulent refund. AL-MAAREJ or a co-conspirator at AL-MAAREJ's direction impersonated P1 and requested a refund from VC4 under false pretenses. VC4 issued P1 a refund for the value of the items, and P1 kept the merchandise.

24. Snohomish County resident Purchaser 2 (P2) also participated in the fraud in April 2022. P2 ordered items worth approximately \$1,500 from VC1. VC1 shipped those items to P2's residence within the Western District of Washington. P2 then requested a fraudulent refund from Simple Refunds. AL-MAAREJ, or a co-conspirator at AL-MAAREJ's direction, accessed P2's account at VC1, falsely claimed that P2 did not receive the items, and secured P2 a fraudulent refund, while permitting P2 to keep the ordered items. AL-MAAREJ, or a co-conspirator at AL-MAAREJ's direction, bragged about this order on the Simple Refunds vouches page, claiming they "fixed failed order."

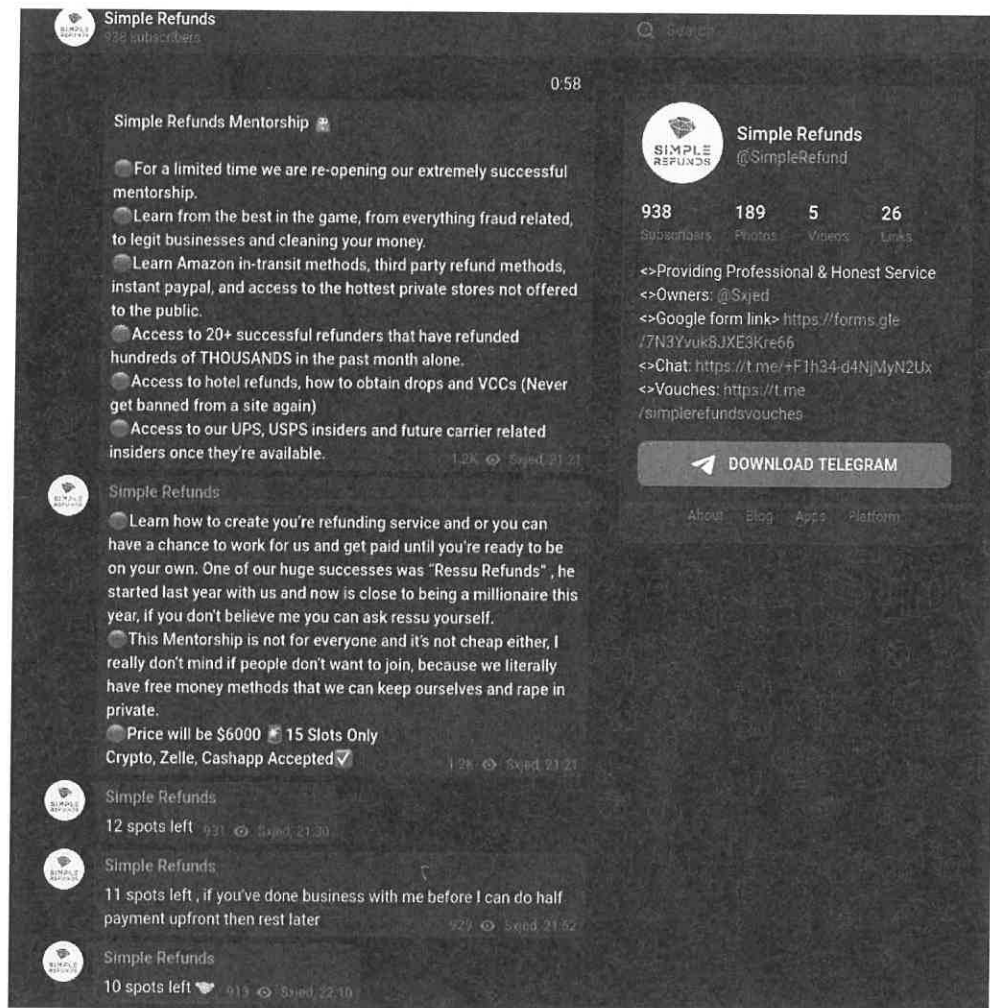
c. AL-MAAREJ Operated Simple Refunds with Intent to Defraud

25. AL-MAAREJ operated the Telegram moniker @sxjed and the email account sxjed11@gmail.com as part of the fraudulent scheme. AL-MAAREJ used these monikers to conceal his identity and thwart law enforcement detection.

26. AL-MAAREJ publicly boasted about the illegal nature of his “business” and mocked the Victim Companies. For example, in March 2022, AL-MAAREJ posted correspondence from Victim Company 5 (VC5) that said: “we have associated your order with a screenshot/voucher found on a professional refunding service page . . . Please note, [VC5] treats the use of these professional refunding sites seriously and will report such incidents to the appropriate local police departments.” AL-MAAREJ commented to Simple Refunds followers: “👀👀👀👀 look at this Bullshit Scare tactic 👀👀 [VC5] send me your btc address let me donate y’all sound hurt.”

27. The next month, AL-MAAREJ shared an image of stacks of currency a Purchaser claimed they made from refunding. AL-MAAREJ commented “🙏 Everyone Eatin Off [VC1] 💰”

28. In May 2022, AL-MAAREJ offered a “mentorship” program through which customers could learn how to create their own refunding scam or work for Simple Refunds. He charged \$6,000 for admission into the mentorship program. Participants paid AL-MAAREJ directly via cryptocurrency or another peer-to-peer payment service, such as Zelle or Cashapp. One of the selling points Simple Refunds used to recruit individuals into the mentorship program states, “Learn from the best in the game, from everything fraud related, to legit businesses and cleaning your money,” as shown in the screenshot below:



29. While he was running Simple Refunds, AL-MAAREJ also personally engaged in fraudulent refunding whereby he sought and obtained refunds for himself

without returning the refunded items. AL-MAAREJ boasted about his personal refunding activities on Simple Refunds to attract Purchasers to the fraud.

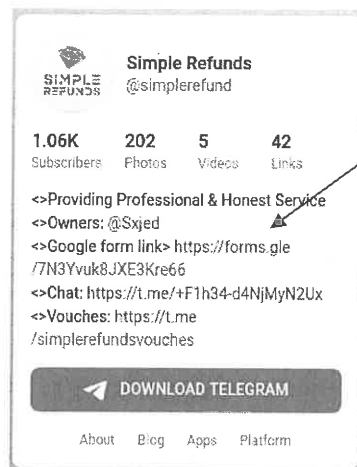
30. As an example of AL-MAAREJ's fraudulent refunding: Victim Company 8 [VC8] shipped more than 200 orders to AL-MAAREJ's home in Michigan between January 2021 and July 2023. Many orders were in AL-MAAREJ's name, but others were under pseudonyms such as "Saj Almaarej," which allowed AL-MAAREJ to evade VC8's fraud detection efforts. AL-MAAREJ sought and VC8 issued refunds for each item of merchandise for a total of more than \$500,000. Throughout the course of the fraud, AL-MAAREJ personally obtained refunds from retailers worth approximately \$1,000,000.

31. On or about December 28, 2022, AL-MAAREJ sold Simple Refunds to another Telegram user.

D. Use of Interstate Wires and Mailings

32. The Simple Refunds conspiracy involved use of interstate wire transmissions.

33. For example, no later than February 23, 2022, and lasting throughout the duration of the fraud, AL-MAAREJ used a Google-based order intake system. Purchasers desiring a fraudulent refund provided order information to AL-MAAREJ through a form available through Google and accessible to anyone with access to a link posted on the Simple Refunds Telegram channel. That link is shown below:



34. Purchasers who clicked the link were taken to a web-based Google Form. Purchasers input data into the form, and when they pressed “submit,” the data traveled over the wires from the customers’ location to a Google server, where it was stored and later accessed by AL-MAAREJ or a co-conspirator so they could execute the fraud. This data communication involved the foreseeable use of interstate or foreign wires, including interstate wires originating and terminating in the Western District of Washington. For example, on or about March 10, 2022, P1 entered information into the Google Form from their home in Snohomish County, Washington. When P1 pressed “submit,” that information traveled from the Western District of Washington to servers outside of Washington state.

35. The Simple Refunds conspiracy also involved use of the mails, as shipped through interstate mail carriers. AL-MAAREJ, through Simple Refunds, directed customers to use both private and public interstate mail carriers, including but not limited to FedEx, USPS, and UPS. Customers ordered goods from the Victim Companies with the intent of using Simple Refunds to fraudulently seek refunds for those goods without returning the items. Some of those items were shipped to the Western District of Washington.

All in violation of Title 18, United States Code, Section 1349.

COUNTS 2-5

(Wire Fraud)

36. The Grand Jury incorporates by reference Paragraphs 1-35 of this Indictment as if fully set forth herein.

37. Beginning at a time unknown, but no later than on or about September 21, 2020, and continuing through at least September 20, 2023, in Snohomish County, within the Western District of Washington, and elsewhere, SAJED AL-MAAREJ, and others known and unknown, with the intent to defraud, knowingly devised, participated in, and

1 executed a scheme and artifice to defraud, and to obtain money and property by means of
2 materially false and fraudulent pretenses, representations, and promises, as further
3 described below.

4 38. The essence of the scheme and artifice to defraud was to fraudulently
5 obtain merchandise refunds from Victim Companies on behalf of Purchasers (co-
6 schemers) by submitting false or fraudulent information to the Victim Companies about
7 the Purchasers and their orders. This false or fraudulent information deceived the Victim
8 Companies into issuing the Purchaser a refund for a purchased item, while also
9 permitting the Purchaser to keep the item. The Purchaser then paid AL-MAAREJ a
10 percentage of the value of the refund, thereby enabling AL-MAAREJ to enrich himself.

11 39. On or about the dates set forth below, in Snohomish County, within the
12 Western District of Washington, and elsewhere, for the purpose of executing and
13 attempting to execute this scheme and artifice to defraud, AL-MAAREJ and others,
14 aiding and abetting each other, did knowingly transmit and cause to be transmitted, by
15 wire communication in interstate and foreign commerce, the following writings, signs,
16 signals, pictures, and sounds, each transmission of which constitutes a separate count of
17 this Indictment. Each wire was a foreseeable part of the scheme and artifice to defraud.
18 Each of the following offenses was committed in furtherance of, and was a foreseeable
19 part of, the conspiracy charged in Count 1 of this Indictment.

Count	On or About Date	Wire
2	March 10, 2022	P1 enters order information into Simple Refunds Google Form from Snohomish County, Washington. Information travels from Western District of Washington to servers located outside of Washington State.
3	March 11, 2022	P1 re-enters order information into Simple Refunds Google Form from Snohomish County, Washington. Information travels from Western District of Washington to servers located outside of Washington State.
4	April 1, 2022	P1 enters order information into Simple Refunds Google Form from Snohomish County, Washington. Information travels from Western District of Washington to servers located outside of Washington State.
5	April 7, 2022	P2 enters order information into Simple Refunds Google Form from Snohomish County, Washington. Information travels from Western District of Washington to servers located outside of Washington State.

All in violation of Title 18, United States Code, Sections 1343 and 2.

COUNTS 6-8

(Mail Fraud)

40. The Grand Jury incorporates paragraphs 1-35 of this Indictment as if fully alleged herein.

1 41. Beginning at a time unknown, but no later than on or about September 21,
2 2020 and continuing through at least September 20, 2023, in Snohomish County, within
3 the Western District of Washington, and elsewhere, SAJED AL-MAAREJ, and others
4 known and unknown, with the intent to defraud, knowingly devised, participated in, and
5 executed a scheme and artifice to defraud, and to obtain money and property by means of
6 materially false and fraudulent pretenses, representations, and promises, as further
7 described below.

8 42. The essence of the scheme and artifice to defraud was to fraudulently
9 obtain merchandise refunds from Victim Companies on behalf of Purchasers (co-
10 schemers) by submitting false or fraudulent information to the Victim Companies about
11 the Purchasers and their orders. This false or fraudulent information deceived the Victim
12 Companies into issuing the Purchaser a refund for a purchased item, while also
13 permitting the Purchaser to keep the item. The Purchaser then paid AL-MAAREJ a
14 percentage of the value of the refund, thereby enabling AL-MAAREJ to enrich himself.

15 43. It was part of the scheme and artifice to defraud that Purchasers ordered
16 merchandise from the Victim Companies with the intent of using AL-MAAREJ and
17 Simple Refunds to secure a fraudulent refund. The Victim Companies used public and
18 private interstate mail carriers to deliver the merchandise to the Simple Refunds
19 customers. These mailings were a foreseeable part of the scheme and artifice to defraud.

20 44. On or about the dates set forth below, in Snohomish County, within the
21 Western District of Washington, and elsewhere, AL-MAAREJ, and others, aiding and
22 abetting each other, for the purposes of executing the above-described scheme to defraud
23 and to obtain money and property, and attempting to do so, did knowingly cause to be
24 delivered by United Parcel Service, a private and commercial interstate carrier, according
25 to the direction thereon, and received by the recipient identified below, the parcels
26 specified below. Each mailing constitutes a separate count of this Indictment. Each of the
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1 following offenses was committed in furtherance of, and was a foreseeable part of, the
2 conspiracy charged in Count 1 of this Indictment.

Count	On or About Date	Mailing
6	March 4, 2022	P1 receives UPS parcel with tracking number ending in 3969 at address in Snohomish County, Washington.
7	March 31, 2022	P1 receives UPS parcel with tracking number ending in 5419 at address in Snohomish County, Washington.
8	March 31, 2022	P1 receives UPS parcel with tracking number ending in 6461 at address in Snohomish County, Washington.

12 All in violation of Title 18, United States Code, Sections 1341 and 2.

14 **FORFEITURE ALLEGATION**

15 The allegations contained in Counts 1–8 of this Indictment are hereby realleged
16 and incorporated by reference for the purpose of alleging forfeiture. Upon conviction of
17 an offense alleged in Counts 1–8, SAJED AL-MAAREJ shall forfeit to the United States
18 any property that constitutes or is traceable to proceeds of the offense. All such property
19 is forfeitable pursuant to Title 18, United States Code, Section 981(a)(1)(C), by way of
20 Title 28, United States Code, Section 2461(c) and includes but is not limited to a sum of
21 money reflecting the proceeds the Defendant obtained from the offense.
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Substitute Assets. If any of the above-described forfeitable property, as a result of any act or omission of the defendant,

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or,
- e. has been commingled with other property which cannot be divided without difficulty,

it is the intent of the United States to seek the forfeiture of any other property of the defendant, up to the value of the above-described forfeitable property, pursuant to Title 21, United States Code, Section 853(p).

A TRUE BILL: *Yes*

DATED: *Sept. 20, 2023*

Signature of Foreperson redacted pursuant to the policy of the Judicial Conference of the United States.

FOREPERSON

[Signature]

TESSA M. GORMAN
Acting United States Attorney

[Signature]

SETH WILKINSON
Assistant United States Attorney

[Signature]

LAUREN WATTS STANIAR
Assistant United States Attorney